

Jane G. Kearl (CA 156560)  
Colin C. Holley (CA 191999)  
**WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.**  
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cholley@watttieder.com

*Attorneys for Creditor  
Barnard Pipeline, Inc.*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF CONTINUED PERFECTION  
OF MECHANICS LIEN PURSUANT TO 11  
U.S.C. § 546(b)(2)**

Solano County (Lien 201900004644)

Barnard Pipeline, Inc. ("Barnard"), by and through its undersigned counsel, hereby gives notice of continued perfection of its mechanics lien under 11 U.S.C. § 546(b)(2), as follows:

1. Barnard has provided and delivered labor, services, equipment, and/or materials for the construction and improvements of projects located in the County of Solano, State of California (the "Property"), the legal description for which is set forth in the Claim of Mechanics Lien, a true copy of which is attached hereto as **Exhibit A** (the "Mechanics Lien").

2. The Property is owned by PG&E Corporation and/or Pacific Gas and Electric Company (collectively, the "Debtors"), which filed voluntary petitions for relief under Chapter 11

1 of Title 11 of the United States Code (the “Bankruptcy Code”) on January 29, 2019 (the “Petition  
2 Date”).

3 3. On January 25, 2019, before the Petition Date, Barnard properly and timely recorded  
4 its Mechanics Lien under California Civil Code § 8400, *et seq.* in the Official Records of Solano  
5 County, State of California.

6 4. Through January 25, 2019, the amount owing to Barnard subject to its Mechanics  
7 Lien is at least \$134,646.92, exclusive of accruing interest and other charges, and additional  
8 amounts which have continued and are continuing, to accrue after the Petition Date.

9 5. California Civil Code § 8460(a) provides that:

10 The claimant shall commence an action to enforce a lien within 90  
11 days after recordation of the claim of lien. If the claimant does not  
12 commence an action to enforce the lien within that time, the claim  
of lien expires and is unenforceable[.]

13 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be  
14 commenced within 90 days after recordation of the claim of lien. However, section 362 of the  
15 Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its  
16 mechanics lien. *See* 11 U.S.C. § 362.

17 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

18 ... requires seizure of such property or commencement of an action  
19 to accomplish such perfection, or maintenance or continuation of  
20 perfection of an interest in property; and ... such property has not  
21 been seized or such an action has not been commenced before the  
22 date of the filing of the petition; such interest in such property shall  
be perfected, or perfection of such interest shall be maintained or  
continued, by giving notice within the time fixed by such law for  
such seizure or such commencement.

23 *See* 11 U.S.C. § 362; *see also Village Nurseries v. Gould (In re Baldwin Builders)*, 232 B.R. 406,  
24 410-11 (9<sup>th</sup> Cir. 1999); *Village Nurseries v. Greenbaum*, 101 Cal.App.4<sup>th</sup> 26, 41 (Cal. Ct. App.  
25 2002).

26 8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the  
27 Property pursuant to California’s mechanics lien law. Barnard is filing and serving this notice to  
28 perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

1 comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and  
2 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having  
3 recorded a mechanics lien in the recorder's office for the county where the Property is located and  
4 then having commenced an action to foreclose the lien in the proper court. By this notice, the  
5 Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce  
6 Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard  
7 intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests,  
8 perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds,  
9 products, offspring, rents, or profits of the Property.

10 9. The filing of this notice shall not be construed as an admission that such filing is  
11 required under the Bankruptcy Code, the California mechanics lien law, or any other applicable  
12 law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its  
13 lien is senior to and effective against entities that may have acquired rights or interests in the  
14 Property previously.

15 10. The filing of this notice shall not be deemed to be a waiver of Barnard's right to  
16 seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other  
17 rights or defenses.

18 11. Barnard reserves all rights, including the right to amend or supplement this notice.

19 Dated: April 1, 2019

**WATT, TIEDER, HOFFAR & FITZGERALD,  
L.L.P.**

By: 

Jane G. Kearl (CA 156560)  
Colin C. Holley (CA 191999)  
2040 Main Street, Suite 300  
Irvine, CA 92614  
Telephone: 949-852-6700  
Facsimile: 949-261-0771  
Email: jkearl@watttieder.com  
cholley@watttieder.com

*Attorneys for Creditor  
Barnard Pipeline, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as **Exhibit B**.

  
Jane G. Kearl

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**EXHIBIT A**

Recording requested by:  
Barnard Pipeline, Inc.

Recorded In Official Records of Solano County

**Marc C. Tonnesen**  
Assessor/Recorder

1/25/2019  
1:16:13 PM  
AR21  
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And when recorded mail this document to:

Jane G. Kearl, Esq.  
Robert C. Shaia, Esq.  
Watt, Tieder, Hoffar & Fitzgerald, LLP  
2040 Main Street, Suite 300  
Irvine, CA 92614

BARNARD PIPELINE INC

Doc # **201900004644**



Title:	1	Page:	3
Fees			\$29.00
Taxes			\$0.00
Other			\$75.00
Paid			\$104.00

For recorder's use

**MECHANICS' LIEN**  
(Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the City of Dixon, County of Solano, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") in all easements and all improvements, structures, and pipelines therein, in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2, including, specifically, without limitation, all right, title and interest of PG&E in improvements, structures and pipelines located approximately from 9075 Old Davis Road, north along the roadway to Levee Road.

2. After deducting all just credits and offsets, the sum of \$134,646.92 together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment and/or materials for replacing approximately 1500 feet of 10-inch high pressure gas line, including 500 feet of pipe installed by hangers on bridge crossing, and related construction work performed under the Alliance Agreement Contract between Claimant and PG&E and Contract Work Authorization No. C9708, or as otherwise requested by PG&E.

3. Claimant furnished the labor, services, equipment and/or materials, at the request of: PG&E.

4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32<sup>nd</sup> Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January 22, 2019

BARNARD PIPELINE, INC.

By: [Signature]  
Zach Bowler, Vice President

#### VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January 22, 2019

By: [Signature]  
Zach Bowler, Vice President

#### **NOTICE OF MECHANICS LIEN**

#### **ATTENTION!**

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT [www.cslb.ca.gov](http://www.cslb.ca.gov).



1 **PROOF OF SERVICE**

2 I, Julie Benton, declare:

3 I am employed in the County of Orange, State of California. I am over the age of 18 years  
4 and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine,  
5 California 92614-6232.

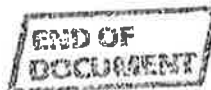
6 On January 23, 2019, I served ☐ the originals ☒ true copies of the following document(s)  
7 described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties  
8 in this action, by placing the document(s) listed above in a sealed envelope with postage thereon  
9 fully prepaid, the United States mail at Irvine, California addressed as set forth below:

10 Pacific Gas & Electric Company (PG&E)  
11 77 Beale Street, 32<sup>nd</sup> Floor  
12 San Francisco, CA 94105

13 I declare under penalty of perjury under the laws of the State of California that the foregoing  
14 is true and correct.

15 Executed on January 23, 2019, at Irvine, California.

16   
17 Julie Benton  
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## **EXHIBIT B**

Case Name	Attorney	Address	City	State	Zip	Phone	Email
Counsel for Mirra Tretvick, including other Fire Victim Testaments	ADLER LAW GROUP, APC	402 West Broadway	San Diego	CA	92101	619-531-8700	ladler@theadlerfirm.com
Counsel for Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Aera Energy LLC	10000 Ming Avenue 601 West Fifth Street, Suite 300	Bakersfield	CA	93311	661-665-5791	benmar59@hotmail.com
Counsel for TRANSWESTERN PIPELINE COMPANY, LLC	AKERMAN LLP	2001 Ross Avenue, Suite 3600	Los Angeles	CA	90071	213-688-9500	sumner@theadlerfirm.com
Counsel for TRANSWESTERN PIPELINE COMPANY, LLC	AKERMAN LLP	580 California Street	Dallas	TX	75201	214-770-4300	RASymm@serenergy.com
Counsel for Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Alin Gump Straus Hauer & Feld LLP	1999 Avenue of the Stars	San Francisco	CA	94104	415-765-9500	evylina.jentry@akerman.com
Counsel for Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Alin Gump Straus Hauer & Feld LLP	One Bryant Park	Los Angeles	CA	90067	310-229-1000	ylena.archyan@akerman.com
Counsel for Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	ANDREWS & THORNTON	4701 Von Karman Ave	New York	NY	10036	212-872-1000	john.mitchell@akerman.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	1301 Avenue of the Americas	Newport Beach	CA	92660	949-315-3540	avcawford@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	555 West Fifth Street	New York	NY	10019	212-484-3900	dmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	555 West Fifth Street	Los Angeles	CA	90013-1065	213-629-7400	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Los Angeles	CA	90013-1065	213-629-7400	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	New York	NY	10019	212-836-8000	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Bedminster	NJ	07921	908-234-3318	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	San Francisco	CA	94102-7004	415-510-3367	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Oakland	CA	94612-0550	510-879-0815	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Los Angeles	CA	90013	213-269-6326	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Whittier	CA	90601	562-889-0182	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Los Angeles	CA	90025-0509	310-442-8875	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	San Francisco	CA	94111	415-542-8730	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Dallas	TX	75201	214-953-6500	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	San Francisco	CA	94111	415-291-6200	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Nashville	TN	37203	615-776-5544	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	New Orleans	LA	70170	504-566-5292; 504-566-5200	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Los Angeles	CA	90067-2909	424-204-4353	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Phoenix	AZ	85004-2555	410-361-8930	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Wilmington	DE	19801	302-252-4428	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	New York	NY	10036	646-855-2464	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Dallas	TX	75219	214-521-3605	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Los Angeles	CA	90074-3485	213-621-4000	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	San Mateo	CA	94402	415-513-5985	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Wilmington	DE	19801	302-442-7010	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	San Francisco	CA	94104	415-659-7924	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Irvine	CA	92614	949-474-1880	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Irvine	CA	92614	949-474-1880	delmondo@alvingump.com
Counsel for AOKF, NA, solely in its capacity as Indenture Trustee	ARENT FOX LLP	250 West 55th Street	Sacramento	CA	95814	916-325-4000	delmondo@alvingump.com

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Counsel for Coastal Power Corporation and Halicki & Wolfject LP	Deitons US LLP	1221 Avenue of the Americas	New York	NY	10020-1089	212-768-6701	oscar.plinkas@deitons.com
Counsel for Travelers Insurance	Deitons US LLP	1221 Avenue of the Americas	New York	NY	10020	212-768-6800	peter.wolfson@deitons.com
Counsel to Southwire Company LLC	Deitons US LLP	601 S. Figueroa Street	Los Angeles	CA	90017-5704	213-623-9924	arnaud.maliet@deitons.com
Counsel for the Group of Subrogation Claim	Deitons US LLP	100 West San Fernando	San Jose	CA	95113	408-971-6271	klennner@deitons.com
Counsel for the Committee of Unsecured Tort Claimants of the	Diermer & Weil, LLP	2000 Avenue of the Stars	Los Angeles	CA	90067-4704	310-595-3000	david.riley@diaper.com
Counsel for the Committee of Unsecured Tort Claimants of the	DIA PIPER LLP (US)	555 Mission Street	San Francisco	CA	94105-2933	415-436-2500	eric.feldberg@diaper.com
Counsel for the Committee of Unsecured Tort Claimants of the	DIA PIPER LLP (US)	20 Bicentennial Circle	Sacramento	CA	95826	916-379-3599	joshua.morse@diaper.com
Counsel for the Committee of Unsecured Tort Claimants of the	DREYER BABICH BUCCOLA WOOD CAMPOIRA, LLP	333 South Grand Avenue, Suite 2100	Los Angeles	CA	90071	213-457-1800	scampora@dbwc.com
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Counsel for the Committee of Unsecured Tort Claimants of the	Dykema Gossett LLP	808 Travis	Houston	TX	77002	713-265-0350	leah@dykema.com
Counsel for the Committee of Unsecured Tort Claimants of the	EDP Renewables North America LLC	409 - 13th Street	Oakland	CA	94612	510-465-0404	leslie.freiman@edpr.com
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Counsel for the Committee of Unsecured Tort Claimants of the	Engel Law, P.C.	888 First St NE	Nevada City	CA	94123	858-807-6773	larry@engeladvice.com
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Counsel for the Committee of Unsecured Tort Claimants of the	Finestone Hayes LLP	3000 K Street, NW, Suite 600	Washington	DC	20007-5109	415-481-5481	jhayes@fwplaw.com
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Counsel for the Committee of Unsecured Tort Claimants of the	FOLEY & LARONER LLP	124 East Fourth Street	Tulsa	OK	74103-5010	202-672-5399	emorabito@foley.com
Counsel for the Committee of Unsecured Tort Claimants of the	FREDERIC DORWART, LAWYERS PLLC	1201 N. Orange St.	Wilmington	DE	19801	302-425-5814	brnelson@foley.com
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Counsel for the Committee of Unsecured Tort Claimants of the	Gibson, Dunn & Crutcher LLP	1717 8th Street	Philadelphia	PA	19103	302-425-5814	chig@clawgroup.com
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Counsel for the Committee of Unsecured Tort Claimants of the	Greene Radovsky Maloney Share & Henigh LLP	Four Embarcadero Center	San Francisco	CA	94111-4106	415-981-1400	mosenthal@gsbndunn.com
Counsel for the Committee of Unsecured Tort Claimants of the	GROSS & KLEIN LLP	The Embarcadero	San Francisco	CA	94111	415-671-4628	gross@grosskleinlaw.com
Counsel for the Committee of Unsecured Tort Claimants of the	Grotefeld Hoffmann Herckentals	700 Lakeside Landing Circle, Suite 280	Larkspur	CA	94939	415-988-2982	ngrotefeld@ghaw-llp.com
Counsel for the Committee of Unsecured Tort Claimants of the	Hinckley, Allen & Snyder LLP	27500 Riverview Center	Bonita Springs	FL	34134	239-301-1106	wpickett@ghaw-llp.com
Counsel for the Committee of Unsecured Tort Claimants of the	HOGAN LOVELLS US LLP	1999 Avenue of the Stars	Los Angeles	CA	90067	310-785-4600	alex.sher@hoganlovells.com
Counsel for the Committee of Unsecured Tort Claimants of the	HOGAN LOVELLS US LLP	875 Third Avenue	New York	NY	10022	212-918-3100	hampton.foushee@hoganlovells.com
Counsel for the Committee of Unsecured Tort Claimants of the	HOGAN LOVELLS US LLP	1999 Avenue of the Stars	Los Angeles	CA	90067	310-785-4600	benjamin.spiegel@hoganlovells.com
Counsel for the Committee of Unsecured Tort Claimants of the	HOGAN LOVELLS US LLP	875 Third Avenue	New York	NY	10022	212-918-3100	porter.ivanick@hoganlovells.com

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Case No.	Case Name	Attorney	Address	City	State	Phone	Email
19-30088	Counsel to County of San Luis Obispo	Attn: Kevin J. Lamb, Michael K. Suttery, Thomas G. Welch	333 South Grand Avenue, Suite 4200	Los Angeles	CA	90071	klamb@klfirm.com
19-30088	Counsel for Pacific Mobile Structures, Inc.	Attn: Brad T. Summers	601 SW Second Avenue, Suite 2100	Portland	OR	97204	klamb@klfirm.com
19-30088	Counsel to Energy Marketing and Trade, LLC	Attn: Adam E. Malatesta	355 S. Grand Avenue, Suite 100	Los Angeles	CA	90071-1560	summers@lupowell.com
19-30088	Counsel to Black Creek Cogeneration, Middle River Power, LLC	Attn: Amy C. Quartarolo	355 South Grand Avenue, Suite 100	Los Angeles	CA	90071-1560	adam.malatesta@lw.com
19-30088	Counsel to Energy Marketing and Trade, LLC	Attn: Caroline A. Reckler, Andrew M. Parlen	885 Third Avenue	New York	NY	10022-4834	amy.quartarolo@lw.com
19-30088	Counsel to Black Creek Cogeneration, Middle River Power, LLC	Attn: Christopher Harris, Andrew M. Parlen	885 Third Avenue	New York	NY	10022-4834	caroline.reckler@lw.com
19-30088	Counsel to Black Creek Cogeneration, Middle River Power, LLC	Attn: Patricia Williams Prewitt	10953 Vista Lake Ct.	New York	NY	10022-4834	andrew.parlen@lw.com
19-30088	Counsel to Black Creek Cogeneration, Middle River Power, LLC	Attn: Richard M. Olson, Esq. & Jacob M. Faircloth, Esq.	2036 Nevada City Highway, Suite 636	Grass Valley	CA	95945-7700	christopher.harris@lw.com
19-30088	Counsel to Black Creek Cogeneration, Middle River Power, LLC	Attn: Wayne A. Silver	100 E Street, Suite 104	Santa Rosa	CA	95404	andrew.parlen@lw.com
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